EXHIBIT 8

PUBLIC REDACTED VERSION

Google Analytics and Google Analytics for Firebase on Alphabet Properties Policy

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go/_gapo_cy

Las reviewed on 2019 11 25

Purpose / Audience

The Goog e Ana yt cs and Goog e Ana yt cs for F rebase on A phabet Propert es Po cy sets out the m n mum pr vacy standa ds and equ ements fo teams us ng Goog e Ana yt cs o Goog e Ana yt cs fo   ebase on **Alphabet properties** These requ rements go beyond those for externa Goog e Ana yt cs customers for severa reasons, nc ud ng Goog e's pos t on as both cont o e and p ocesso

For the use of Goog e Ana yt cs on Apps products ava ab e under the GSu te agreement/ToS, refer to the Apps / GfW / dashe_po_cy

Th s po cy app es to a fu -t me and part-t me emp oyees, **extended workforce**, and other author zed representat ves of A phabet and ts subs d a es

Definitions

Alphabet Property
    A Goog e o A phabet p oduct, s te, o se v ce (nc ud ng webs tes, c ent p oducts, and mob e apps) A phabet propert es can be both _nterna -fac ng_ and Externa -fac ng

External facing Alphabet Property
    An A phabet property that has users externa to A phabet (nc ud ng advert sers, pub shers, customers, and end-users)

Internal facing Alphabet property
    An A phabet property that does not have customers or users externa to A phabet

First Party (1P)
    Any stakeho der or product that s part of Goog e or A phabet

Third Party (3P)
    Any ent ty externa to A phabet

cid
    Goog e Ana yt cs C ent D See th s he p-center art c e

GA "Sensitive Features"
    Goog e Ana yt cs funct ona t es that requ re PWG rev ew pr or to use

- Use D Ove de (conce n potent a to co ect P (Use D))
- Sess on Un ficat on (concern jo n ng s gned-out and s gned- n data, s nce other Goog e products may nk s gned- n data to P)
- Remarket ng (concern potent a to eak/ nk P nto Goog e Ads data)

Exhibit 20

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Principles

There are five pr nc p es that gu de the requ rements n th s po cy

Principle	Description
Conformance	Proper overs ght s requ red when us ng Goog e Ana yt cs across Goog e and A phabet propert es
Collection	P must not be co ected by Goog e Ana yt cs f P s acc denta y tracked by Goog e Ana yt cs, you must scrub t out of GA's data repos tory
Deletion & Retention	The use of Goog e Ana yt cs must adhere to the Goog e Ana yt cs tanda d Retent on P an, wh ch spec fies that non agg egated Goog e Ana yt cs data cannot be eta ned onge than 14 months
1P Data Sharing	Goog e Ana yt cs first-party data may not be shared outs de of your respect ve A phabet company Any export of GA data between A phabet compan es must be rev ewed w th PWG Ana yt cs pr or to shar ng
3P Tools	Do not use ana yt cs too s othe than Goog e Ana yt cs and Goog e Ana yt cs fo ebase w thout p vacy and secu ty ev ew (fo examp e, PUR)

Requirements

Principle Conformance

The use of Google Analytics on external facing Alphabet properties must be reviewed by the PWG associated with your product or service.

A equests shou d be subm tted th ough the PWG Ana yt cs ev ew fo m go/o&o ev ew A ev ew must be equested when enab ng Goog e Ana yt cs for the first t me and when data co ect on changes f Goog e Ana yt cs s a ready used, or when enab ng GA ens t ve eatu es

GA integrations are not allowed on Alphabet properties, products, and services without explicit approval from PWG Analytics

Bets operating under their own privacy policy, rather than the Google Privacy Policy, cannot implement Google Analytics until the respective Bet legal counsel has reviewed and approved that the implementation of Google Analytics is consistent with the Bet's privacy disclosures, including its own cookie notices.

Acco d ng to the Goog e Ana yt cs Te ms of e v ce, such p vacy d sc osu es equ e the fo ow ng

"You must post a Pr vacy Po cy, and that Pr vacy Po cy must prov de not ce of your use of cook es that are used to co ect data You must d sc ose the use of Goog e Ana yt cs, and how t co ects and p ocesses data Th s can be done by d sp ay ng a prom nent nk to the s te How Goog e uses data when you use our partners' s tes or apps , www.goog e com/po c es/p vacy/pa tne s/, o any othe UR Goog e may p ov de f om t me to t me) You w use commerc a y reasonab e efforts to ensure that a V s tor s prov ded w th c ear and comprehens ve nformat on about, and consents to sto ng and access ng of coo es o othe nfo mat on on the V s to s dev ce whe e such act v ty occu s n connect on w th the Serv ce and where prov d ng such nformat on and obta n ng such consent s requ red by aw"

o mo e nfo mat on on coo e consent, p ease see He p ng Pub she s and Adve t se s w th onsent

Principle Data Collection

An Alphabet property must not collect PII or identifiers that can be joined to PII in Google Analytics

Use Best pract ces to avo d send ng Persona y dent fiab e nformat on (P)

There are severa common use cases where data may be over ooked as P , as defined n the Data C ass ficat on Gu de nes (sted n sect on 1, subsect on "Where do P eaks often happen wh e us ng GA?

- Permanent dent fiers or any other dent fiers that cannot be reset (for examp e, MAC address, ME , P address)
- f you p an to use custom d mens ons, refer to Data C ass ficat on Gu de nes to ensure no P s co ected
- Hashed or encrypted P - Th s s cons dered P on Goog e or A phabet propert es
- Page URL - The most common way n wh ch nadvertent P s captured

Exhibit 20

- Referrer URL - May not be your URL, but set our responses by Ly
- Search query - There s a most a ways some user who searches for h s/her ema   address
- Custom d mens ons or var ab es
- Ecommerce data - Transact on D, order Ds m ght be trans t ve P s
- Parameters referrer from the referrer URL

If **PII** is accidentally tracked by Google Analytics, you must report the details to **PII injection reporting form** so this data can be scrubbed out of GA's data repository. (This process is managed by **analytics-data-deletion-requests@**, not by **pwg_analytics@**)

An Alphabet property must not send either **explicit location or indirect user position** information (except as included in default analytics collection) into an Analytics property

An Alphabet property must ensure Google Analytics cookies are not logged by the product (separately from Google Analytics)

Do not collect cid (or application instance id) to non-GA storage such as Sawmill and/or Clearcut.

Principle: Deletion & Retention

Alphabet properties should not retain **non-aggregated** Google Analytics data longer than the default 14 months without explicit approval from pwg retention

An Alphabet property that uses Google Analytics must **reference the GA standard retention plan** in the PDD.

Principle: First-Party Sharing (i.e., data export of GA data to a different Google or Alphabet platform)

Do not share first-party data outside of your Bet.

Due to the esu t ng exposu e of the data owne , Goog e Ana yt cs fi st pa ty data may not be sha ed outs de of you respect ve A phabet company For examp e, t wou d be proh b ted to up oad exported Goog e Ana yt cs data to a market ng o chest at on p atfo m outs de of you A phabet company

Enabling GA's ability to export from GA to a Google platform (e.g., Integrated Google Cloud Services (BigQuery)) must be reviewed in advance by **pwg_analytics@** See **go/o&o_review** for more information

Any downstream use of GA data export, like combining GA data with other data sources using cid-keyed data, timestamps or location in a deterministic or probabilistic fashion must be reviewed in advance by **pwg_analytics@**

Even probab st c jo ns are prob emat c depend ng on the accuracy of the jo n and the fide ty of the assoc ated data on e the s de of the o n They may sta t to oo dete m n st c; the efo e, we do not a ow fo   o ns w thout exp c t ev ew

Principle: Third-Party Sharing

Use of third-party analytics services and tools on Google or Other Bet properties must be approved by **pwg-analytics@** in addition to third party security reviews

Exceptions

 xcept ons to th s po cy must be app oved by the D ecto of P vacy o de egate

References

Related Documents:

- P o to us ng Goog e Ana yt cs, ev ew the fo ow ng esou ces to unde stand usage equ ements, po c es, and m tat ons
  - GA 1P P nc p es & P ocesses T a n ng (go/ga o&o p nc p es t a n ng)
  - go/pwg-ga
  - ett ng up an nte na Goog e Ana yt cs Account (go/ ga)

- - Setting up a continuous monitoring of bot-testing Google Analytics data (go/bot-monitoring)
    - Links to [other relevant documentation, sides, docs](#)
  - For Google Tag Manager (GTM) on Alphabet properties, please refer to these [guidelines](#)

Questions / Feedback

If you have a question about the guidance in this document or its applicability, start with the relevant [Privacy Working Group](#) or Product Counsel [(go/which-lawyer)](#)

If you have feedback on this document, send an email to [pp-questions](#) █████████

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